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 AMERICAN STATES INSURANCE COMPANY and
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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9	MARCIA FREUD, an Individual,)	CASE NO.: 2:16-cv-02623-JAD-VCF
10	Plaintiff,)	
11	vs.)	STIPULATION AND ORDER FOR
12	AMERICAN STATES INSURANCE)	EXTENSION OF TIME FOR
13	COMPANY d/b/a SAFECO INSURANCE,)	PLAINTIFF TO FILE ITS REPLY IN
14	an Indiana corporation; GUILLERMO)	SUPPORT OF MARCIA FREUD'S
15	URRUTIA, an individual; BEATRIS)	MOTION TO REMAND AND MOTION
16	URRUTIA, an individual; DOES I through X,)	FOR ATTORNEY'S FEES
17	inclusive and ROE CORPORATIONS I)	
18	through X, inclusive,)	[ECF No. 22]
19	Defendants.)	

18 **COME NOW**, Plaintiff, MARCIA FREUD (hereinafter "Plaintiff"), by and through
 19 her attorney, the law firm of BREEDEN & ASSOCIATES, PLLC, and Defendants,
 20 AMERICAN STATES INSURANCE COMPANY (hereinafter "American States") and
 21 SAFECO INSURANCE COMPANY OF INDIANA (hereinafter "Safeco") erroneously
 22 named as AMERICAN STATES INSURANCE COMPANY d/b/a SAFECO, and hereby
 23 agree to an extension of time for Plaintiff to file her Reply in support of her Motion to Remand
 24 and Motion for Attorney's Fees (hereinafter "Motion") (Court Document #12). The
 25 Stipulation is intended to be submitted in compliance with LR IA 6-1. The underlying Motion
 26 was filed December 12, 2016, and Plaintiff's Reply in support of that Motion is understood to
 27 originally be due on this date, January 3, 2017. This is the first request to extend the deadline
 28 for Plaintiff to file a Reply in support of her Motion. Presently, no hearing has been scheduled

1 for Plaintiff's Motion. The parties stipulate to extend the time for Plaintiff to file her Reply in
 2 support of her motion to remand until January 16, 2017.

3 To the extent necessary, the parties stipulate good cause appears to be presented to
 4 permit the extension agreed-upon herein. In particular, the Stipulation is submitted on this date
 5 upon learning of a medical emergency for counsel for Plaintiff requiring counsel for Plaintiff
 6 to unexpectedly depart his office without ability to return until January 9, 2017, at the earliest.

7 Dated this 3rd day of January, 2017.

Dated this 3rd day of January, 2017.

8 BREEDEN & ASSOCIATES, PLLC

KOELLER NEBEKER CARLSON &
 HALUCK, LLP

9
 10 By:  10437

11 For ADAM J. BREEDEN, ESQ.
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 12 Las Vegas, NV 89146
 Attorney for Plaintiff,
 13 MARCIA FREUD

By: 

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16 **ORDER**

17 Good cause appearing, IT IS HEREBY ORDERED that the time for
 18 plaintiff to file any reply in support of her motion to remand and for attorney's fees
 [ECF No. 12] is **EXTENDED** to January 16, 2017.

19 DATED this 3rd day of January, 2017.

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 21 
 22 Jennifer A. Dorsey
 23 United States District Judge
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